

Exhibit 1

Plaintiffs' Requests for Production to OpenAI

REQUEST FOR PRODUCTION NO. 28:

ALL DOCUMENTS YOU have provided to ANY United States regulatory body, INCLUDING state or local regulatory DOCUMENTS and DOCUMENTS provided voluntarily or otherwise regarding generative AI, GitHub, COPILOT OR OPENAI.

RESPONSE TO REQUEST FOR PRODUCTION NO. 28:

OpenAI objects to the production of electronically stored information before an applicable ESI protocol has been entered. OpenAI objects to this request for “ALL DOCUMENTS” OpenAI has provided to “ANY United States regulatory body . . . regarding generative AI, GitHub, COPILOT OR OPEANI” as overly broad, unduly burdensome, and disproportionate to the needs of this case. OpenAI objects to this request to the extent it seeks information protected by the attorney-client privilege, work-product doctrine, common-interest privilege, or any other applicable privilege or protection. OpenAI objects to this request as seeking information and/or documents that are not relevant to any claim or defense in this litigation and/or that are not proportional to the needs of this case. OpenAI objects to this request to the extent it seeks confidential or proprietary information. OpenAI objects to this request to the extent it seeks information protected from disclosure by the First Amendment.

Subject to the foregoing General and Specific Objections, OpenAI states that it will not produce documents in response to this request.

REQUEST FOR PRODUCTION NO. 29:

All DOCUMENTS YOU have provided to the United States Department of Justice or the Federal Trade Commission pursuant to 15 U.S.C. § 18a (Hart Scott Rodino Act) in connection with the purchase or acquisition of any interest in OPENAI or GitHub, including any responses to second

requests, and any transcripts of interviews testimony or other information or data, whether provided formally or informally.

RESPONSE TO REQUEST FOR PRODUCTION NO. 29:

OpenAI objects to the production of electronically stored information before an applicable ESI protocol has been entered. OpenAI objects to this request for “ALL DOCUMENTS” OpenAI has provided to “the United States Department of Justice or the Federal Trade Commission pursuant to 15 U.S.C. § 18a (Hart Scott Rodino Act) in connection with the purchase or acquisition of any interest in OPENAI or GitHub” as overly broad, unduly burdensome, and disproportionate to the needs of this case. OpenAI objects to this request to the extent it seeks information protected by the attorney-client privilege, work-product doctrine, common-interest privilege, or any other applicable privilege or protection. OpenAI objects to this request as seeking information and/or documents that are not relevant to any claim or defense in this litigation and/or that are not proportional to the needs of this case. OpenAI objects to this request to the extent it seeks confidential or proprietary information. OpenAI objects to this request to the extent it seeks information protected from disclosure by the First Amendment.

Subject to the foregoing General and Specific Objections, OpenAI states that it will not produce documents in response to this request.

REQUEST FOR PRODUCTION NO. 30:

All DOCUMENTS you have filed with the Securities and Exchange Commission in connection with the purchase, acquisition or sale of any interest in OPENAI or GitHub or any other Defendant.

RESPONSE TO REQUEST FOR PRODUCTION NO. 30:

OpenAI objects to the production of electronically stored information before an applicable ESI protocol has been entered. OpenAI objects to this request for “ALL DOCUMENTS” as overly broad, unduly burdensome, and disproportionate to the needs of this case. OpenAI objects to this request as seeking information and/or documents that are not relevant to any claim or defense in this litigation. OpenAI objects to this request on the ground that it seeks the disclosure of information available from public sources or as accessible to Plaintiffs as to OpenAI. OpenAI objects to this request to the extent it seeks information protected by the attorney-client privilege, work-product doctrine, common-interest privilege, or any other applicable privilege or protection.

Subject to the foregoing General and Specific Objections, OpenAI refers Plaintiffs to <https://www.sec.gov/edgar/searchedgar/companysearch> for copies of documents filed publicly with the Securities and Exchange Commission.

REQUEST FOR PRODUCTION NO. 31:

ALL DOCUMENTS YOU have provided to ANY regulatory body outside the United States, INCLUDING DOCUMENTS provided voluntarily or otherwise regarding generative AI, GitHub COPILOT or OPENAI.

RESPONSE TO REQUEST FOR PRODUCTION NO. 31:

OpenAI objects to the production of electronically stored information before an applicable ESI protocol has been entered. OpenAI objects to this request for “ALL DOCUMENTS” OpenAI has “provided to ANY regulatory body outside the United States” as overly broad, unduly burdensome, and disproportionate to the needs of this case. OpenAI objects to this request as seeking information and/or documents that are not relevant to any claim or defense in this

litigation. OpenAI objects to this request to the extent it seeks information protected by the attorney-client privilege, work-product doctrine, common-interest privilege, or any other applicable privilege or protection. OpenAI objects to this request to the extent it seeks confidential or proprietary information. OpenAI objects to this request to the extent it seeks information protected from disclosure by the First Amendment.

Subject to the foregoing General and Specific Objections, OpenAI states that it will not produce documents in response to this request.

REQUEST FOR PRODUCTION NO. 32:

ALL DOCUMENTS YOU have provided to ANY United States legislator or legislative body, INCLUDING US Senators, US Representatives, Congress, state legislators, and local legislators and INCLUDING DOCUMENTS provided voluntarily or otherwise and DOCUMENTS consisting of testimony or recordings of testimony regarding generative AI, GitHub, COPILOT or OPENAI.

RESPONSE TO REQUEST FOR PRODUCTION NO. 32:

OpenAI objects to the production of electronically stored information before an applicable ESI protocol has been entered. OpenAI objects to this request for “ALL DOCUMENTS” OpenAI has provided to “ANY legislator or legislative bod United States regulatory body . . .consisting of testimony or recordings of testimony regarding generative AI, GitHub, COPILOT or OPENAI” as overly broad, unduly burdensome, and disproportionate to the needs of this case.

OpenAI objects to this request to the extent it seeks information protected by the attorney-client privilege, work-product doctrine, common-interest privilege, or any other applicable privilege or protection. OpenAI objects to this request as seeking information and/or documents that are not relevant to any claim or defense in this litigation. OpenAI objects to this request to the

extent it seeks confidential or proprietary information. OpenAI objects to this request to the extent it seeks information protected from disclosure by the First Amendment.

Subject to the foregoing General and Specific Objections, OpenAI states that it will not produce documents in response to this request.

REQUEST FOR PRODUCTION NO. 33:

DOCUMENTS sufficient to IDENTIFY ALL government affairs OR lobbying entities YOU have engaged in connection with generative AI, GitHub, COPILOT or OPENAI.

RESPONSE TO REQUEST FOR PRODUCTION NO. 33:

OpenAI objects to the production of electronically stored information before an applicable ESI protocol has been entered. OpenAI objects to this request for “DOCUMENTS sufficient to IDENTIFY ALL governing affairs OR lobby entities” as overly broad, unduly burdensome, and disproportionate to the needs of this case. OpenAI objects to this request to the extent it seeks information protected by the attorney-client privilege, work-product doctrine, common-interest privilege, or any other applicable privilege or protection. OpenAI objects to this request as seeking information and/or documents that are not relevant to any claim or defense in this litigation. OpenAI objects to this request to the extent it seeks confidential or proprietary information. OpenAI objects to this request to the extent it seeks information protected from disclosure by the First Amendment.

Subject to the foregoing General and Specific Objections, OpenAI states that it will not produce documents in response to this request.

Plaintiffs' Interrogatory No. 3 to OpenAI

INTERROGATORY NO. 3:

Identify by name all individuals or entities who possess or have possessed stock or ownership interests in You greater than five percent.

RESPONSE TO INTERROGATORY NO. 3:

OpenAI objects to this interrogatory as overly broad, unduly burdensome, and disproportionate to the needs of this case because it seeks to identify “all individuals or entities who possess or have possessed stock or ownership interests” greater than five percent in OpenAI. OpenAI also objects on the grounds that this interrogatory seeks information not relevant to any claims or defense in this litigation.

Based on the foregoing general and specific objections, OpenAI responds that it does not intend to respond to this interrogatory as drafted at this time.